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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:19-cr-00429-SI-1
3:19-cr-00596-SI-2

v.

JOSEPH LUCIO JIMENEZ,

**GOVERNMENT’S SENTENCING
MEMORANDUM**

Defendant.

The government submits this sentencing memorandum in advance of defendant’s sentencing hearing on September 23, 2020, at 9:00 a.m. Defendant previously pleaded guilty to Felon in Possession of a Firearm (Case No. 3:19-cr-00429-SI-1) and Conspiracy to Distribute a Controlled Substance (Case No. 3:19-cr-00596-SI-2). Defendant has been in continuous custody for over a year, since July 23, 2019.

The offense conduct is accurately outlined in the Presentence Investigation Report in Paragraphs 15 – 45. The parties’ calculation of the advisory guideline range differs slightly from

the U.S. Probation Office, as the parties are not recommending a multi-count adjustment under USSG § 3D1.4. However, this difference in proposed guideline ranges does not affect the parties' sentencing recommendation.

The government joins the defense in recommending a sentence of time-served, to be followed by a three-year term of supervised release. Among the special conditions of supervised release, the parties recommend that defendant be required to attend and complete an inpatient drug treatment program, and that defendant shall remain in custody until such an inpatient bed becomes available, as approved by the U.S. Probation Office.

Dated: September 17, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/ Craig J. Gabriel

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